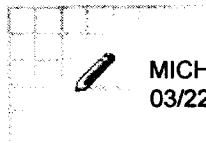


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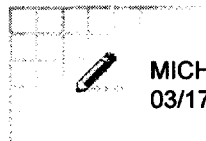


MICHAEL MCATEER  
03/22/2000 05:28 PM

To: Thomas Martin

Subject: Revised UAO for Sauget Area 1 Dead Creek

----- Forwarded by MICHAEL MCATEER/R5/USEPA/US on 03/22/2000 04:29 PM -----



MICHAEL MCATEER  
03/17/2000 04:13 PM

To: dmligh, Itape cc: Epa4213, KEVIN TURNER

Subject: Revised UAO for Sauget Area 1 Dead Creek

Mike and Linda:

Tom Martin, Kevin Turner and I talked this morning regarding our general reactions to the revised UAO sent by Linda yesterday (3/16/00). As I mentioned to Mike over the phone earlier today we believe the revisions made to incorporate Illinois' comments on the cap, liner etc. seem to cover most of the State's concerns. We will wait to hear back from Illinois as to whether any further additions are needed. We may also want to think about moving a lot of these technical requirements into a separate appendix to the UAO.

There are a few issues which U.S. EPA is still concerned about and will need to be addressed before the Agency can issue the UAO. First, the requirement for conducting a risk-based analysis for determining where the cover in the creek will need to be placed appears outside the scope of a time-critical removal action. There is a distinct possibility of protracted discussions on risk numbers that make this option difficult to implement for a removal. We need to discuss this matter as soon as possible. Second, there appears to be no mention of a groundwater monitoring plan as part of the construction of the TSCA cell. Given that it may be 2 to 3 years before any remedial action is taken at the site, it is not possible to put the monitoring program off until that time. Finally, references to a mitigation plan for re-vegetating the area in and around the creek will also need to be addressed as part of this removal action. Again, waiting to address these issues until a remedial action is taken leaves a big time gap.

We need to talk over these issues early next week with the goal of getting a final UAO ready for sign-off by the end of this month.

Please call with any questions.

Thanks.

Mike McAteer  
312/886-4663